

REMARKS

This paper is submitted in reply to the Office Action dated September 19, 2007, within the three-month period for response. Reconsideration and allowance of all pending claims are respectfully requested. In the subject Office Action, claims 1-7 and 16-27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,785,693 to DeLorme et al. (*DeLorme*).

Applicant respectfully traverses the Examiner's rejections to the extent that they are maintained.

Rejections under 35 U.S.C. §103(a)

The Examiner has rejected claims 1-7 and 16-27 of which claims 1, 16, 21, and 22 represent the independent claims. The Examiner contends that *DeLorme* teaches all of the claim elements of the independent claims. *DeLorme* discloses a filesystem configured with a master/slave object attribute table in a directory structure. Specifically in the passages cited by the examiner with reference to the independent claims, *DeLorme* discloses a single filesystem having multiple Object Attribute Tables (OAT), one for each directory. (Col. 7, lines 21-23). Each OAT contains a number of Object Attribute Table Entries (OATE) corresponding to each file that is linked to that directory object. (Col. 7, lines 7-10). The operating system establishes a Master OATE in the directory object that is the first directory to link to the file. (Col. 7, lines 27-29). When another directory subsequently links to the same file, "a slave OATE is established in the OAT of the new directory object." (Col. 7, lines 42-44). The slave OATEs are the same physical size as the master OATE, but do not actually contain any of the attributes of the file. Only the master OATE contains the attribute information associated with the file. (Col. 7, lines 49-59). *DeLorme* therefore discloses a single filesystem capable of having a file referenced in multiple directories, the first instance being a master reference containing all of the file attribute data, and the remaining instances being slaves referencing the master.

DeLorme additionally discloses only one directory reference in the file. Specifically in FIG. 3 and at col. 7, lines 37-40, *DeLorme* discloses that the file header (372) contains the address of only the master OATE (380). *DeLorme* further discloses that when

deallocating a master OAT, a slave is upgraded to the master, attribute data relating to the file is copied from the old master to the slave becoming the new master and the header (372) of the file is updated with the address (380) of the new master. (Col. 8, lines 27-33).

Independent claim 1 positively recites “storing in the data structure a first anchor point that references the first directory, said first directory being of a first filesystem implementation” and “storing in the data structure a second anchor point that references the second directory, said second directory being of a second filesystem implementation different than the first.” (Emphasis added) In other words, independent claim 1 requires two filesystems with different filesystem implementations and two anchor points in the object to those filesystems.

DeLorme fails to disclose, among other items, two filesystems with different filesystem implementations in the passages cited by the Examiner or anywhere else in the reference as required by independent claim 1. *DeLorme* also fails to disclose two anchor points linking an object to the two filesystems. *DeLorme* discloses only one filesystem with master and slave object attribute table entries. The file in *DeLorme* only references one directory (anchor point), which is the master. As disclosed, when the master is deallocated, the file header is updated with the address of the new master, further emphasizing only one anchor point. Accordingly, claim 1 is novel over *DeLorme*, and the rejection should be withdrawn. Additionally, *DeLorme* does not even suggest the use of two different filesystem implementations, nor an object with two anchor points to the two filesystems, and the Examiner provides no objective reason why one of ordinary skill in the art would be motivated to modify *DeLorme* to include multiple filesystem implementations or any of the other claimed subject matter of claim 1. Claim 1 is therefore non-obvious over *DeLorme* as well, and as such, reconsideration and allowance of claim 1, and of claims 2-7 which depend therefrom, are respectfully requested.

Independent claims 16, 21, and 22 also recite first and second filesystems with different filesystem implementations, as well as a data structure with anchor points referencing first and second directories, as in independent claim 1, and are therefore allowable for at least the

same reasons stated above. Reconsideration and allowance of independent claims 16, 21 and 22, and of claims 17-20 and 23-27 which depend therefrom, are therefore respectfully requested.

As a final matter, Applicant further notes that the remaining dependent claims recite additional features that further distinguish these claims from the *DeLorme* reference cited by the Examiner. However, in the interest of prosecutorial economy, these remaining claims will not be addressed separately herein.

Conclusion

Applicant has made a bona fide effort to respond to each and every requirement set forth in the Office Action. In view of the foregoing amendments to the claims and remarks given herein, Applicant respectfully believes this case is in condition for allowance and respectfully requests allowance of the pending claims. If the Examiner believes any detailed language of the claims requires further discussion, the Examiner is respectfully asked to telephone the undersigned attorney so that the matter may be promptly resolved. The Examiner's prompt attention to this matter is appreciated.

Applicant is of the opinion that no additional fee is due as a result of this Amendment. Payment of all charges due for this filing is made on the attached Electronic Fee Sheet. If any additional charges or credits are necessary to complete this communication, please apply them to Deposit Account No. 23-3000.

Respectfully submitted,

December 18, 2007
Date

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